

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

RAUL GERARDO RUIZ-MALDONADO
a/k/a Nariz, a/k/a Narizon
ALEXANDER SAMUEL RAMIREZ-RENDON
a/k/a "Licenciado"
IGNACIO MONTES LEON
a/k/a La Guayaba, a/k/a Nacho
MARIA REMEDIOS URRUTIA
MARCO ANTONIO MELCHOR
a/k/a Pelon
DANA SCOTT BALL
JORGE DANIEL MONTES-CERVANTES
a/k/a Patito
JENNY EILEEN URRUTIA
REYNA URRUTIA
CHRISTIAN URRUTIA ROJAS
SAMMAR AIMEE MELCHOR
ANCELMO AYALA
a/k/a Chemo
JOSE MERCED GOMEZ MURILLO
OSCAR MATA GARCIA
SAFA GOBAH
JUAN JOSE RAMOS
ROBERT JOVAUN HARRIS
EFRAIN RAMON PAGAN ROSARIO
NATHANAEL ORTIZ ANDINO

Criminal No. 15-4 Erie

(21 U.S.C. §§ 846, 841(a)(1)
841(b)(1)(B)(ii),
841(b)(1)(B)(viii),
841(b)(1)(C) and
856(a)(2)
18 U.S.C. §§ 1513(b)(2),
1956(a)(1)(B)(i) and 2)

(Under Seal)

FILED

FEB 17 2015

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

INDICTMENT

COUNT ONE

The grand jury charges:

From in and around June 2013, to in and around January 2015,
the precise date being unknown, in the Western District of

Pennsylvania and elsewhere, the defendants, RAUL GERARDO RUIZ-MALDONADO, also known as Nariz and Narizon; Alexander Samuel Ramirez-Rendon, also known as "Licenciado"; IGNACIO MONTES LEON, also known as La Guayaba and Nacho; MARIA REMEDIOS URRUTIA; MARCO ANTONIO MELCHOR, also known as Pelon; DANA SCOTT BALL; JORGE DANIEL MONTES-CERVANTES, also known Patito; JENNY EILEEN URRUTIA; REYNA URRUTIA; CHRISTIAN URRUTIA ROJAS; SAMMAR AIMEE MELCHOR; ANCELMO AYALA, also known as Chemo; JOSE MERCED GOMEZ MURILLO; OSCAR MATA GARCIA; SAFA GOBAH; JUAN JOSE RAMOS; ROBERT JOVAUN HARRIS; EFRAIN RAMON PAGAN ROSARIO; and NATHANAEL ORTIZ ANDINO, did knowingly, intentionally and unlawfully conspire with one another and with persons both known and unknown to the grand jury, to distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii); to distribute and possess with intent to distribute less than one hundred (100) grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and to distribute and possess with intent to distribute less than five (5) grams of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Further, the grand jury finds that each of the defendants is individually responsible for the amounts set forth below, as a result of their own conduct and the conduct of other conspirators that was reasonably foreseeable to them:

Raul Gerardo Ruiz-Maldonado	Five (5) kilograms or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)
Alexander Samuel Ramirez-Rendon	Five (5) kilograms or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)
Ignacio Montes Leon	Five (5) kilograms or more of cocaine Fifty (50) grams or more of methamphetamine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii) 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)
Maria Remedios Urrutia	Five (5) kilograms or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)
Marco Antonio Melchor	Five (5) kilograms or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)
Dana Scott Ball	Five (5) kilograms or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)
Jorge Daniel Montes-Cervantes	Less than five hundred (500) grams of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
Jenny Eileen Urrutia	Five hundred (500) grams or more of cocaine Fifty (50) grams or more of methamphetamine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii) 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)
Reyna Urrutia	Five hundred (500) grams or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii)
Christian Urrutia Rojas	Less than five hundred (500) grams of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)

Sammar Aimee Melchor	Five hundred (500) grams or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii)
Ancelmo Ayala	Five hundred (500) grams or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii)
Jose Merced Gomez Murillo	Less than Five hundred (500) grams of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
Oscar Mata Garcia	Five (5) kilograms or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)
Safa Gobah	Five (5) kilograms or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)
Juan Jose Ramos	Five hundred (500) grams or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii)
Robert Jovaun Harris	Five hundred (500) grams or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii)
Efrain Ramon Pagan Rosario	Five hundred (500) grams or more of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii)
Nathanael Ortiz Andino	Less than five hundred (500) grams of cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT TWO

The grand jury further charges:

On or about August 14, 2013, in the Western District of Pennsylvania, the defendant, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute less than fifty (50) grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THREE

The grand jury further charges:

On or about September 3, 2013, in the Western District of Pennsylvania, the defendants, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, JENNY EILEEN URRUTIA, and JORGE DANIEL MONTES-CERVANTES, also known as Patito, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute less than one hundred (100) grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

The grand jury further charges:

On or about September 18, 2013, in the Western District of Pennsylvania, in and around the premises at 2709 West 12th Street, Erie, Pennsylvania, the defendant, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute less than one hundred (100) grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (C) .

COUNT FIVE

The grand jury further charges:

On or about September 24, 2013, in the Western District of Pennsylvania, in and around the premises at 2709 West 12th Street, Erie, Pennsylvania, the defendant, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT SIX

The grand jury further charges:

On or about October 18, 2013, in the Western District of Pennsylvania, in and around the premises at 2709 West 12th Street, Erie, Pennsylvania, the defendant, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT SEVEN

The grand jury further charges:

From on or about November 6, 2013, to on or about November 7, 2013, in the Western District of Pennsylvania, in and around the premises at 2709 West 12th Street, Erie, Pennsylvania, the defendants, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, and JENNY EILEEN URRUTIA, did intentionally and unlawfully possess with intent to distribute and distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT EIGHT

The grand jury further charges:

From on or about November 8, 2013, to on or about December 4, 2013, in the Western District of Pennsylvania, in and around the premises at 2709 West 12th Street, Erie, Pennsylvania, the defendants, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, and JENNY EILEEN URRUTIA, did knowingly, intentionally and unlawfully possess with intent to distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (B) (viii) and Title 18, United States Code, Section 2.

COUNT NINE

The grand jury further charges:

On or about December 13, 2013, in the Western District of Pennsylvania, the defendants, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, and another individual whose identity is known to the grand jury, but who is not named herein, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance and less than fifty (50) grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii) and 841(b)(1)(C).

COUNT TEN

The grand jury further charges:

Between on or about December 11, 2013 and on or about December 13, 2013, in the Western District of Pennsylvania, the defendants, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT ELEVEN

The grand jury further charges:

On or about May 12, 2014, in the Western District of Pennsylvania, the defendant, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, did knowingly engage in conduct which threatened bodily injury to an individual known to the grand jury, with intent to retaliate against that person, for giving information to a law enforcement officer relating to the commission or possible commission of a federal offense.

In violation of Title 18, United States Code, Section 1513(b)(2).

COUNT TWELVE

The grand jury further charges:

Between on or about September 14, 2014, to on or about September 16, 2014, in the Western District of Pennsylvania, and elsewhere, the defendants, IGNACIO MONTES LEON, also known as La Guayaba and Nacho, MARIA REMEDIOS URRUTIA, JENNY EILEEN URRUTIA, JORGE DANIEL MONTES-CERVANTES, also known as Patito, OSCAR MATA GARCIA, and SAFA GOBAH, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

The grand jury further charges:

On or about October 28, 2014, in the Western District of Pennsylvania, the defendants, MARIA REMEDIOS URRUTIA, SAMMAR AIMEE MELCHOR, and ROBERT JOVAUN HARRIS, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute less than five hundred (500) grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

The grand jury further charges:

From in and around August 2013 to in and around January 2015, in the Western District of Pennsylvania, the defendant, CHRISTIAN URRUTIA ROJAS, did manage or control any building, room, or enclosure, either as an owner, lessee, agent, employee, or mortgagee, and did knowingly and intentionally make available for use, with or without compensation, the building, room, or enclosure for the purpose of unlawfully manufacturing, storing, distributing, or using a controlled substance, to wit, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, at 100 Billings Drive, Edinboro, Pennsylvania.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNTS FIFTEEN AND SIXTEEN

The grand jury further charges:

On or about May 12, 2014, in the Western District of Pennsylvania, MARCO ANTONIO MELCHOR, also known as Pelon, did knowingly conduct and attempt to conduct the following financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, knowing that the property involved represented the proceeds of some form of unlawful activity, and knowing that said financial transactions were designed in whole or in part to conceal and disguise the location, source, ownership and control of the proceeds of specified unlawful activity; in that the defendant, MARCO MELCHOR,

COUNT SIXTEEN	Caused \$20,000.00 cash to be deposited into the First Niagara Bank Account # XXXXXX5745 of J.A.
COUNT SEVENTEEN	Wire transferred \$19,974.00 to "The Internet Car Lot" the same day for partial payment for a vehicle, to wit: a 2007 BMW 760Li

each such financial transaction representing a separate count of the Indictment, which involved the proceeds of specified unlawful activity, specifically, the distribution of controlled substances in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE ALLEGATION

The United States hereby gives notice to the defendants charged in Count One that, upon their conviction of any such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses.

1. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States code, Section 853(p), to seek forfeiture of any other property

of such defendants up to the value of the forfeitable property described in this forfeiture allegation.

A true bill



Foreperson



DAVID J. HICKTON
United States Attorney
PA ID No. 34524